

**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
EASTERN DIVISION**

# LATONYA CHAMES

**Plaintiff,**

**V.**

**SHERIFF MATTHEW WADE,**

**Defendant.**

**Case No.: 1:21-cv-1571-CLM**

**PLAINTIFF’S MOTION FOR LEAVE TO FILE EXHIBIT AND WITNESS  
LISTS AND MOTIONS IN LIMINE OUT OF TIME**

Plaintiff, Latonya Chames (“Chames”) files this motion for leave to file exhibit and witness lists and motions in limine out of time for the following reasons:

1. On February 11, 2025, Defendant Sherriff Matthew Wade (“Wade”) submitted his Brief in Support for Motion for Summary Judgment (Doc. 57) asking the Court to summarily dismiss Chames claims of race and gender discrimination under § 1981, 1983, and Title VII in Counts 1, 4, 5, 7, and 8 of her complaint.<sup>1</sup>

2. Additionally, Wade asked the Court to dismiss Chames retaliation claims under §1981.<sup>2</sup> On March 6, 2025, Chames filed her opposition to Wade's summary judgment brief, asking the Court not to dismiss any of Chames claims and allow this case to proceed to trial. (Doc. 63).

3. Without a ruling on summary judgment, Plaintiff does not know which, if any, claims will be dismissed on a summary judgment ruling. This makes it difficult for Chames to focus on which exhibits and witnesses would be pertinent to present at trial.

4. Wade is not prejudiced currently by delay. Chames has emailed and called defense counsel about this issue without a response.

Thus, Plaintiff is asking for leave to file the witness list, exhibit list and her motion and limine is out of time until after the summary judgment opinion has been issued. Plaintiff apologizes to the court for not filing this motion sooner.

Respectfully submitted,

/s/ Blake C. Edwards

/s/ Nicole D. Edwards

*Attorneys for Plaintiff*

**OF COUNSEL:**  
**EDWARDS & EDWARDS**  
**ATTORNEYS AND MEDIATORS, PLLC**

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<sup>2</sup> Id.

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 20, 2025, I officially sent the foregoing via electronic mail to the following:

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/s/ Nicole D. Edwards  
OF COUNSEL